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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

and

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 DM

Chapter 11

(Jointly Administered)

**CALIFORNIA FRANCHISE TAX
BOARD'S REQUEST FOR SPECIAL
NOTICE**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

* All papers shall be filed in the Lead Case
No. 19-30088 DM

PLEASE TAKE NOTICE that the California Franchise Tax Board ("FTB"), interested party herein in the above-captioned Chapter 11 jointly administered case, hereby requests that all notices given or required to be given in this case to creditors, any creditors' committee, or any other party in interest (including all matters described pursuant to Bankruptcy Code Section 102(1) and Bankruptcy Rules 2002(a), (b), (c), (f) and (i), 3017(a), 9007 and 9010) and all papers or other documents filed, served, or required to be served in the above-captioned Case, be served

1 on the addressees listed below and that, pursuant to Bankruptcy Rules 2002(g) and 9007, the
2 following be added to the Court's master mailing list:

3 Carissa Lynch
4 State of California Franchise Tax Board
5 Mail Stop A-260
6 P.O. Box 1720
7 Rancho Cordova, CA 95741-1720
8 Telephone: 916-845-7835
9 Facsimile: 916-845-3648
10 E-mail: Carissa.Lynch @ftb.ca.gov

11 PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the
12 notices and papers referred to in the rules specified above but also includes, without limitation,
13 orders and notices of any plans, disclosure statements, applications, motions, petitions, pleadings,
14 requests, complaints, demands, whether formal or informal, whether written or oral and whether
15 transmitted or conveyed by mail delivery, telephone, telegraph, facsimile transmission, telex, or
16 otherwise.

17 PLEASE TAKE FURTHER NOTICE that neither this request for notice nor any
18 subsequent appearance, pleading, proof of claim, claim or suit is intended or shall be deemed or
19 construed as:

20 (a) a consent by FTB to the jurisdiction of this Court or any other court with respect to
21 proceedings, if any, commenced in any case against or otherwise involving FTB;

22 (b) a waiver of any right of FTB to (i) have an Article III judge adjudicate in the first
23 instance any case, proceeding, matter or controversy as to which a Bankruptcy Judge may not
24 enter a final order or judgment consistent with Article III of the United States Constitution,
25 (ii) have final orders in non-core matters entered only after de novo review by a District Court
26 Judge, (iii) trial by jury in any proceeding so triable in the Case or in any case, controversy, or
27 proceeding related to the Case, (iv) have the United States District Court withdraw the reference
28 in any matter subject to mandatory or discretionary withdrawal, (v) any and all rights, claims,
actions, defenses, setoffs, recoupments or remedies to which FTB is or may be entitled under
agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and
recoupments are expressly reserved hereby, or (vi) the requirements for service of process under
Federal Rule of Bankruptcy Procedure 7004; or

1 (c) a waiver of any objections or defenses that the State of California, FTB, or any other
2 agency, unit or entity of the State of California may have to this Court's jurisdiction over the
3 State of California, FTB, or such other agency, unit or entity based upon the Eleventh
4 Amendment to the United States Constitution or related principles of sovereign immunity or
5 otherwise, all of which objections and defenses are hereby reserved.

6 This request for notice is based upon the Bankruptcy Code and the Federal Rules of
7 Bankruptcy Procedure, including Rules 2002, 3017, 9007, and 9010, but is not a consent to
8 jurisdiction of the Bankruptcy Court over FTB, and is not a waiver of FTB's rights, specifically,
9 but not limited to: (i) FTB's rights to have final orders in certain matters entered only after de
10 novo review by a district judge; (ii) FTB's rights to trial by jury in any proceeding so triable
11 herein, or in any case, controversy, or proceeding related hereto; (iii) FTB's rights to have the
12 reference withdrawn by the District Court in any matter subject to mandatory or discretionary
13 withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which
14 FTB is or may be entitled under any agreement, in law, or in equity – all of which rights, claims,
15 actions, defenses, setoffs, and recoupments the FTB expressly reserves.

16 Dated: December 4, 2019

17 STATE OF CALIFORNIA
18 FRANCHISE TAX BOARD

19 By: /s/ Carissa Lynch
20 Carissa Lynch
21 Attorneys for California Franchise Tax Board
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